



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Robert M. Duncan, Treasurer  
Republican National Committee - RNC  
310 First Street S.E.  
Washington, DC 20003

MAR 13 2002

Identification Number: C00003418

Reference: Amended March Monthly Report (2/1/01-2/28/01), received 4/25/01

Dear Mr. Duncan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portions attached) discloses one or more contributions which appear to be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in

writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received one or more transfers from the National Republican Senatorial Committee which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

-Schedule A supporting Line 16 of the Detailed Summary Page discloses refunds or rebates of what appear to be previously disclosed allocable expenses from Mentzer Media and Wins of Change. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission.

-Line 21(a)(i) of the Detailed Summary Page of your report discloses a total of \$1,603,041.14 in the federal share for operating expenditures. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$3,905,025.10. Please amend your report to clarify the discrepancy.

-Line 2 of Schedule I, for your Non-Federal account discloses \$1,598,610.93 in total transfers to the federal or allocation account for allocable activities. The sum of the entries itemized on H3, however, indicates the total to be \$1,613,647.58. Please clarify this discrepancy.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during

the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-On Schedule H2, you have disclosed allocation percentage ratios for E1 which do not equal 100% when added together. Please amend your report to correct this discrepancy. 11 CFR §104.10(a)(1)

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, you have failed to provide a breakdown of transfers received by the federal account. Please amend your report to include the missing information.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to numerous vendors. Please amend your report to disclose the appropriate category.

-Schedule H4 discloses disbursements for S and P which are categorized as Fundraising; however, Schedule H2 does not include the allocation ratios for this activity. Please amend Schedule H2 to disclose the omitted ratios.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): supplies. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please clarify all expenditures made for ad cost and media services on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule H4 of your report discloses numerous disbursements to be 100%

federal activity. Be advised that these disbursements do not meet the definition of allocable expenses. Please clarify this discrepancy.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker  
Reports Analyst  
Report Analysis Division

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 or each category of the  
 attached Summary Page

FOR LINE NUMBER: PAGE 1242 / 2042

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (if any)

REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. Norfolk Southern Corp

Mailing Address

3 Commercial Pl

City

State

Zip Code

Norfolk

VA

23510

Date of Receipt

 M / D / Y  
 02 / 22 / 2001

Amount of Each Receipt this Period

720.00

FEC ID Number of contributing  
federal political committee.Name of Employer  
PAC C00008282Occupation  
PAC

PAC C00007850

Receipt For:

Primary

General

Other (specify) \*

Election Year-to-Date \*

720.00

Transaction ID: L11C010228001

Full Name (Last, First, Middle Initial)

B. Delta &amp; Tau Phi

Mailing Address

PO Box 365

City

State

Zip Code

WASHINGTON

DC

20044

Date of Receipt

 M / D / Y  
 02 / 23 / 2001

Amount of Each Receipt this Period

15000.00

FEC ID Number of contributing  
federal political committee.Name of Employer  
PAC C00211318Occupation  
PAC

PAC C00211318

Receipt For:

Primary

General

Other (specify) \*

Election Year-to-Date \*

15000.00

Transaction ID: L11C010228002

C.

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) .....

FEC Schedule A (Revised 1/2001)

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 or each category of the  
 Detailed Summary Page

 FOR LINE NUMBER: **PAGE 1243/2243**

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input checked="" type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16 <input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. NRCC

Mailing Address

320 FIRST STREET SE

City

State

Zip Code

WASHINGTON

DC

20003

 FEC ID number of contributing  
 federal political committee.

Date of Receipt

 M / D / Y  
 02 / 16 / 2001

Amount of Each Receipt this Period

11283.00

Name of Employer

Occupation

TRANSFER

Receipt For:

Primary General

Other (specify)

Section Year-to-Date

11641.20

Transaction ID: 001022855

Full Name (Last, First, Middle Initial)

B. NRCC

Mailing Address

425 2ND STREET NE

City

State

Zip Code

WASHINGTON

DC

20002

 FEC ID number of contributing  
 federal political committee.

Date of Receipt

 M / D / Y  
 02 / 20 / 2001

Amount of Each Receipt this Period

2758.64

Name of Employer

Occupation

TRANSFER

Receipt For:

Primary General

Other (specify)

Section Year-to-Date

2758.64

Transaction ID: 001022860

C.

SUBTOTAL of Receipts This Page (colored)

TOTAL This Period (last page this line number only)

FEC Schedule A (Revised 1/2001)

